



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

May 16, 2013

Mr. Henry Provencio
4FRI Team Leader
1824 South Thompson Street
Flagstaff, Arizona 86001

Subject: Draft Environmental Impact Statement for the Four-Forest Restoration Initiative, Coconino County, Arizona (CEQ# 20130076)

Dear Mr. Provencio:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Four-Forest Restoration Initiative pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA recognizes the Forest Service's commitment, demonstrated in the Four-Forest Restoration Initiative (4FRI or Project) DEIS, to restoration activities within the Coconino and Kaibab National Forests. We also acknowledge the Forest Service's dedication to public outreach and collaboration during the 4FRI NEPA process, and the efforts made to incorporate the best available science into the DEIS. In particular, we appreciate the 4FRI team taking Jason Gerdes, of my staff, on a site visit of the 4FRI planning area, and working with Jason and EPA Region VIII's Richard Graham to include information in the DEIS on the potential for smoke from the proposed prescribed fire treatments to contain radioactive substances.

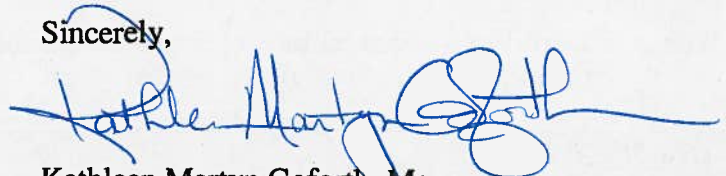
Based on our review of the subject DEIS, we have rated the Preferred Alternative and the document as LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). The EPA acknowledges the need for the use of mechanical thinning and prescribed fire to achieve long-term restoration objectives. We commend the Forest Service for committing, in the Preferred Alternative, to strong best management practices and soil and water conservation practices to protect sensitive resources during mechanical harvest and fire treatments.

We recognize the challenge the Forest Service faces in implementing a restoration project that will rely heavily on prescribed burns and wildfire to achieve Project objectives. The "Fire Ecology Report" that the Forest Service prepared for this Project explains these challenges well. Although the planning area has good air quality and meets all federal ambient air quality standards, the fine particulate matter generated during wildland fire does present a human health risk. We recommend that the Forest Service work with the interagency Smoke Management Group and commit, in the Final EIS and Record of Decision, to implement best management practices to reduce emissions from prescribed burns and wildfires to the greatest possible extent. We also recommend that the Forest Service analyze and include a description, in the FEIS, of the potential for further reductions in air emissions from future forest treatments by lessening or eliminating pile burning of residual fuels in favor of biomass energy production.

The DEIS includes a detailed and thorough description of the possible effects of climate change on the Project, and is strengthened by incorporating elements of two good planning documents: the "Kaibab National Forest's Climate Change Approach for Plan Revision," and the "Southwestern Region Climate Change Trends and Forest Planning." We recommend that the Project's adaptive management plan include a commitment to monitor, mitigate, and respond to, the effects of climate change throughout the life of the 4FRI.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the Final EIS is released, please send one CD copy to this office. If you have any questions, please contact me at 415-972-3521, or contact Jason, the lead reviewer for this project. Jason can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

